IV. REMARKS

The Examiner has disapproved the proposed drawing amendment, stating that the proposed amendment, in particular the added material in phantom referenced by the numeral 38L, introduces new matter. The Applicant respectfully disagrees and request the Examiner reconsider and approved the earlier proposed drawing amendment incorporated by reference herein. As has been noted before, the elements identified by the numeral 38L are merely schematic representation intended to illustrate the subject matter described in the Specification and Claims. In particular, the Specification, on page 3, lines 24-25, states that "[t]he back two retention springs 38' lock into a depression(lip) in the FOUP". Further, Claim 12 recites that "the plurality of retention springs is designed to mate with a lip of a front opening unified pod". Further still, it is shown in Fig. 2-3 that the retention springs when observed directly from the side have a general rectangular profile (i.e. spring 38 has flat top and bottom). From this it is inherent, that the depressions/lip of the FOUP with which the springs mate, must have a shape that allows the flat topped and bottom springs to mate with the depressions/lip. The rectangular element with the reference numeral 38L, in the proposed amendment, only illustrates schematically that the depression/lip 38L in the FOUP exists, no more no less. No other features beyond what is clearly described or is inherent from such description in the Specification and Claims, are intended to be added by the element 38L as shown in the proposed amendment. The description in the Specification, Claims and the subject matter shown in the drawings, clearly convey, both expressly and inherently, to one skilled in the art that the FOUP has depressions/lips with which

the retention springs 38 mate, and that is what is being shown schematically by elements 38L being added in the proposed amendment. Accordingly, it is respectfully submitted, that the addition of schematic elements 38L representing the depression(lip) in the FOUP into which the retention elements 38' lock is not new matter. The Examiner's refusal to add such schematic elements would improperly prejudice the Applicant. The Examiner's objection under 35 U.S.C. 132 is overcome as per the above.

Claim 1 calls for a substrate cassette reducer for reducing a substrate holder (capable of holding a substrate of predetermined size). Neither Fosnight nor Schulte disclose or suggest the features called for in claim 1. Fosnight has been addressed at length in Applicant's prior amendment (mailed 11/3/03) and incorporated by reference herein. Fosnight makes the bare disclosure of a cassette 22 capable of being housed in a pod shell 21. As has been stated before, there is a structural difference between a cassette (such as cassette 22 in Fosnight) and a cassette reducer for reducing a substrate holder as called for in claim 1. The structural differences between a cassette and cassette reducer, are those structural features (such as for example retention members that allow snap in/snap out mounting, and supports accommodating smaller size substrates) that allows the cassette reducer to be removably mounted to a substrate holder or pod that is capable of holding or otherwise incorporates a substrate cassette to reduce the substrate holder enabling it to hold smaller substrates than the holder is otherwise capable of carrying. Nowhere are such features disclosed or suggested in Fosnight. The bare disclosure of a removable substrate holding cassette, such as in

Fosnight, does not make that cassette into a cassette reducer for reducing a substrate holder. Similarly, Schulte also fails to make any disclosure or suggestion whatsoever of a cassette reducer for reducing a substrate holder as called for in claim 1. Schulte merely discloses a carrier 11 capable of holding substrates. The carrier 11 can be lifted and placed on a surface 42 (that causes movable flaps 33 on cammed shaft 27 to move between an open position and blocking position). Thus, like Fosnight, Schulte merely discloses the carrier or cassette itself, but that says nothing about a cassette reducer for reducing a substrate holder as called for in claim 1.

Moreover, claim 1 recites that when mounted to the holder, the cassette reducer effects a reduction in the substrate holder enabling the holder to hold a substrate smaller than a predetermined size. Neither Fosnight, nor Schulte make absolutely any hint of such features. The cassette 22 in Fosnight, when mounted into pod shell 21 makes the pod capable of holding substrates of a predetermined size. Similarly the carrier 11 in Schulte is capable of holding substrates of a given size. However, nothing more than a cassette/pod 22, 21 (or carrier 11) capable of holding substrates of a given size is disclosed. Neither Fosnight, nor Schulte disclose or suggest that the cassette 22 when mounted into pod 21 (or carrier 11) or any other item when mounted to either the cassette 22, pod 21 (or carrier 11) effect a reduction in the substrate holder enabling the holder to hold a smaller substrate than the predetermined size (of substrates the holder is otherwise capable of holding). As stated before, a cassette 22 (Fosnight), and carrier 11 (Schulte), capable of but holding substrates of a given size, are not in and as of themselves capable of effecting a reduction in the substrate holder

enabling the holder to hold smaller substrates than the given size. As neither Fosnight, nor Schulte disclose or suggest the features recited in claim 1, then the combination of Fosnight and Schulte cannot provide features that are not disclosed or suggested in either reference. Claims 1-9 are patentable and should be allowed.

Claim 10 calls for the resiliently flexible retention member projecting outward laterally from the peripheral edge of the at least one of the first substantially U-shaped plate or the second substantially U-shaped plate. Fosnight and Schulte fail to disclose or suggest the features recited in claim 10. Fosnight apparently does not disclose any kind of resiliently flexible retention member. The Examiner appears to agree with this on page 4 of the instant Action. Schulte, however fails to correct the deficiency in Fosnight. As noted before, the carrier 11 in Schulte has spring loaded stop members 29. The stop members 29 comprise a mid-flag portion 33 with top 31 and bottom shaft portions 35. The top portion 31 is located inside cap 23 that is attached to the carrier itself. A spring 41 biases the shaft down so that the bottom portion 35 projects from the bottom of the carrier (see Fig. 4) when the carrier is carried. When the carrier 11 is seated on a flat surface 42, the bottom portion 35 of the shaft is pressed into the bottom of the carrier, causing top portion 31 to move upwards inside cap 23. As shown in Figs. 5-6, upward movement of top portion 31 in cap 23 causes camming of the flag shaft (i.e. cam groove 37 in cap 23 cams pin 39 on top portion 31 of flag pin) thereby rotating the flag 23 (outward) from blocking to unblocking portions (see also col. 3, lines 26-30). Clearly thus, the spring loaded stop members 29 do not retain the carrier in any way, and are not resiliently flexible retention members, much

less resiliently flexible retention members projecting outward laterally from the peripheral edge of the at least one of the first or second substantially U-shaped plates, as otherwise called for in claim 10. Neither Fosnight, nor Schulte disclose or suggest the features recited in claim 10. Hence, the combination of Fosnight and Schulte cannot provide features that are not disclosed or suggested in either reference. Claims 10-13 are patentable over the cited prior art and should be allowed.

Claim 14 recites that the first substantially U-shaped plate has a retention spring projecting outward from an outer edge of the U-shaped plate for engaging a surface of the substrate holder when the semiconductor cassette reducer is mounted to the substrate holder. These features are not disclosed or suggested in either Fosnight or Schulte. As noted before, Fosnight fails to disclose or suggest a spring loaded retention member. Schulte, as stated before also fails to disclose a retention spring, spring 41 merely biasing the flag shaft 33 down, but in no way serving to retain anything. Further, as seen in Figures 2, and 4-6, all of spring 41 is located below the top surface of carrier 11, and clearly fails to project outward from an outer edge of the U-shaped plate. Nor does spring 41 engage a surface of a substrate holder when the carrier 11 is mounted to the substrate holder as also called for in claim 14. As neither Fosnight nor Schulte disclose or suggest the features recited in claim 14, then the combination of Fosnight and Schulte cannot possibly provide features that are not disclosed or suggested in either reference. Claims 14-15 and 17-18 are patentable over the cited prior art and should be allowed.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

Enclosed is a check in the amount of $420.00 for payment of a two month extension of time. The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

a check of $ 420.00

Respectfully submitted,

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9/7/04
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